

Rosen & Kantrow, PLLC
Proposed Attorneys for Debra Kramer, Chapter 7 Trustee
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Avrum J. Rosen, Esq.

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re:

Chapter 7

ANTHONY J. LOSQUADRO,

Case No. 18-47134-cec

Debtor.

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**APPLICATION FOR RETENTION OF ROSEN & KANTROW, PLLC,
AS ATTORNEYS FOR CHAPTER 7 TRUSTEE**

TO: HONORABLE CARLA E. CRAIG
CHIEF UNITED STATES BANKRUPTCY JUDGE

Debra Kramer, Chapter 7 Trustee (“Trustee”) for the estate of Anthony J. Losquadro, debtor (“Debtor”), respectfully submits this application seeking entry of an Order retaining the firm of Rosen & Kantrow, PLLC (“Firm”), as attorneys for Trustee under Sections 105 and 327 of Title 11, United States Code (“Bankruptcy Code”), Rule 2014 of the Federal Rules of Bankruptcy Procedure, and the Local Rules for the United States Bankruptcy Court, Eastern District of New York, and respectfully states as follows:

1. On December 12, 2018 (“Filing Date”), Debtor commenced a voluntary petition for relief under Chapter 7 of the Bankruptcy Code.
2. Debra Kramer was appointed interim Chapter 7 Trustee of the Debtor’s estate and, by operation of law, became the permanent Chapter 7 Trustee.
3. Based upon the Trustee’s review of: (i) Debtor’s Chapter 7 voluntary petition and schedules [ECF Doc. No. 1]; (ii) certain documents maintained by the New York City Department of Finance, which are publicly available on its Automated City Register Information System

(“ACRIS”); and (iii) the database maintained by the New York State Unified Court System, WebCivil Supreme eFiled Documents (“eCourts”), it appears that, as of the Filing Date, the Debtor is the owner of real property commonly known as 2431 Victory Boulevard, Staten Island, New York 10314, identified under Block 482, Lot 3 in the County of Richmond (“Real Property”), which Real Property is the subject of two foreclosure actions pending in the Richmond Supreme Court under Index Nos. 135263/2018 and 135060/2017 with respect to the first and second mortgages, respectively.

4. The Trustee believes that the Real Property maintains equity above and beyond the homestead exemption asserted by the Debtor, and is investigating the disposition of the Real Property for the benefit of creditors of the estate,

5. The Trustee selected the Firm because the attorneys in the Firm are familiar with bankruptcy law and are well qualified to act in the capacity as attorneys for the Trustee.

6. It is necessary for Trustee to employ attorneys to render professional services, which may include, but are not limited to the following:

- a) Assist the Trustee in the investigation of the Debtor’s estate, including the Real Property;
- b) Conduct examinations of the Debtor and other witnesses in connection with the Trustee’s examination of Debtor’s financial affairs;
- c) Prepare motions, orders, pleadings and other documents in connection with the disposition of the Real Property; and
- d) Advise the Trustee in connection with her statutory duties and prepare applications and motions as may be appropriate.

7. To the best of Trustee’s knowledge, and based upon the Affidavit of Avrum J. Rosen, Esq., the attorneys in the Firm have no connection with the Debtor, or any other party in

interest or their respective attorneys.

8. To the best of Trustee's knowledge, the Firm represents no interest adverse to the Trustee or to the estate in the matter in which it is to be engaged herein, and the employment of the Firm would be in the best interests of the estate.

9. The Firm seeks its retention to be as of February 22, 2019 when a detailed review of the records on ACRIS and eCourts commenced.

WHEREFORE, the Trustee respectfully requests for the entry of an Order, substantially in the form of the proposed Order annexed hereto, authorizing the retention of Firm for the Trustee, for which no previous application has previously been made.

Dated: Great Neck, New York
February 24, 2019

/s/ Debra Kramer, Trustee
Debra Kramer, Chapter 7 Trustee of
the Estate of Anthony J. Losquadro
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